

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ANTHONY BELMOSA,

Plaintiff,

-against-

UNITED STATES OF AMERICA,

Defendant.

Civil Docket No.
19-CV-6788

(Cogan, J.)

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DECLARATION OF ALFRED C. HAYWOOD, JR.

I, Alfred C. Haywood, Jr., pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am an employee of the United States Postal Service (“USPS”) and began working for USPS on December 25, 1993. Since 2008, I have been employed as the Manager of Maintenance Operations of the USPS facility at John F. Kennedy International Airport, located at 250 North Boundary Road, Jamaica, New York (the “USPS JFK facility”).

2. As part of my duties as Manager, I am responsible for all aspects of maintenance at the USPS JFK facility, including maintenance of the facility and the equipment.

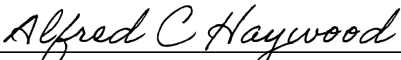
3. On June 12, 2020, I escorted the Plaintiff, his attorney, and Assistant U.S. Attorney Matthew Modafferi to the rear of the USPS JFK facility to inspect the cargo roadway. The Plaintiff identified the area near Bay 88 as the location of the alleged incident that took place on August 22, 2016.

4. Based on a review of the USPS Facilities Management System and maintenance history, the USPS did not receive any complaints about an alleged defect in the cargo roadway in the rear of the USPS JFK facility near Bay 88 on or before August 22, 2016. In addition, I was personally unaware of any defect in the cargo roadway in the rear of the USPS JFK facility near Bay 88 on or before August 22, 2016.

5. The USPS first learned of a complaint regarding an alleged defect in the cargo roadway in the rear of the USPS JFK facility near Bay 88 on June 21, 2018, when the Plaintiff filed an administrative claim with the USPS.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury, that the forgoing is true and correct to the best of my information, knowledge, and belief.

Dated: 09 Nov, 2020



Alfred C. Haywood, Jr.
Manager
United States Postal Service